

**DOCKETED**

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*Comment Received From: Jay Friedland*  
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**ZEV Infrastructure MFG**

*Additional submitted attachment is included below.*



VIA EMAIL – DOCKET 15-MISC-04

October 17, 2018

**ZEV Infrastructure Manufacturing**

The Honorable Janea Scott, Lead Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Feedback on the ZEV Infrastructure Manufacturing Grant Program - Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP)**

Dear Commissioner Scott and Energy Commission Staff,

On behalf of Zero Motorcycles, Inc. we wish to once again express our support of the key goals of the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). Leveraging Energy Commission funding with private capital, Zero Motorcycles has been able to hire more people, sustain growth, and achieve even more innovation as a California based manufacturer.

Zero Motorcycles is a rapidly growing electric vehicle business that designs and manufactures award-winning, high performance, zero emission electric motorcycles. Zero has created more than 125 green jobs in California and has shipped over 10,000 of these extremely fun and environmentally friendly electric motorcycles during the last eleven years. In addition to being an electric vehicle manufacturer which designs and builds our vehicles right here in California, our customers and dealers across the world have also directly benefited from our “Crafted in California” strategy. As the leading manufacturer of electric motorcycles, and the second largest manufacturer of EVs in California, we see the vital need for the ARFVTP to continue to assist California companies.

Specifically, with respect to ARFVTP ZEV Infrastructure Manufacturing funding, we respectfully request that the Energy Commission expand the eligibility requirements for the final Infrastructure Manufacturing solicitation to include vehicle manufacturing projects especially those which support the manufacturing on-vehicle charging technologies which further expand the market for EV charging infrastructure. These technologies are also critical to the overall EV supply chain, which is not yet mature.

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Including the manufacturing of on-vehicle technology is consistent with the goals of the 2016 ZEV Action Plan, 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, and especially with Governor Brown's Executive Order on EV Infrastructure, B-48-18, which states: "California must continue to attract and encourage significant investments in zero-emission vehicles and infrastructure from utilities, car [vehicle] manufacturers and vehicle charging and re-fueling companies."

This grant solicitation can directly support this goal by leveraging the manufacturing of both off-vehicle and on-vehicle EV charging technologies. For electric motorcycles this support is even more critical because according to ARB, the entire fleet of ICE motorcycles now emits 16% more pollution than that of ICE cars, while representing less than 10% of the car volume and less vehicle miles travelled (VMT).

Beyond motorcycles, Zero's powertrain technology is a key part of the electric vehicle supply chain and is now being used in other 2, 3, and 4-wheeled vehicles which would greatly benefit from the onboard DC fast charging technology we have developed. Rapid and widespread deployment of this technology could be enabled by a ZEV Infrastructure Manufacturing grant.

In order to meet our overall GHG and petroleum reduction goals, the Energy Commission needs to make sure it continues to support a broad portfolio of vehicle technologies which all work to transform transportation. Early deployments of thousands of electric motorcycles have had a significant impact on beginning the transformation an entire industry. The largest manufacturers of motorcycles, including Harley Davidson, Honda, Yamaha, and BMW, are now making major investments in electric motorcycles. And the benefits from switching from ICE to electric motorcycles extend far beyond just GHG reductions to include as much as a 30x reduction in criteria pollutants. Consumers and public safety departments across California are already seeing these benefits every day.

Both on-board and off-board EV infrastructure technologies have critical roles and should be eligible for funding in this overall transformation. Support for on-vehicle technology would increase the utilization of DC fast charging infrastructure and is consistent with the goals of Executive Order B-48-18, the 2016 ZEV Action Plan, and the Investment Plan.

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As the Energy Commission considers future funding opportunities and allocations, we also suggest that the future market impact and size, along with GHG, petroleum and criteria pollutant reductions be considered as part of the selection and scoring criteria.

We appreciate all of the work that CEC staff has done on the ZEV Manufacturing Pre-solicitation concept paper and the ARFVTP overall. Thank you very much for your consideration of our comments and your continuing your support of this very important program.

Sincerely,



Jay Friedland  
Vice President, Government Relations  
Zero Motorcycles, Inc.

cc: Larry Rillera, Energy Commission Emerging Fuels and Technologies Office